

# Exhibit C

**From:** [Schaer, Aaron](#)  
**To:** [Jeff.Butler@CliffordChance.com](mailto:Jeff.Butler@CliffordChance.com); [John.Alexander@CliffordChance.com](mailto:John.Alexander@CliffordChance.com)  
**Cc:** [Deibebe, Darcy](#); [Hosenpud, David](#); [Garcia, Tangi](#)  
**Subject:** RE: [EXT] Frontier Airlines v. AMCK, et al. | Case No. 1:20-cv-09713  
**Date:** Monday, January 10, 2022 7:38:10 PM

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Counsel,

We would appreciate a response to our email so that we know how we need to proceed.

Sincerely,



**AARON SCHAER** (he/him)

Associate [Bio](#) | [vCard](#)

[schaera@lanepowell.com](mailto:schaera@lanepowell.com)

**D** 206.223.7103 **C** 248.302.2111

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*Please note I am in the Eastern Time Zone*

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**From:** Hosenpud, David <HosenpudD@LanePowell.com>

**Sent:** Monday, January 10, 2022 5:36 PM

**To:** Jeff.Butler@CliffordChance.com; Garcia, Tangi <GarciaT@LanePowell.com>

**Cc:** Schaer, Aaron <SchaerA@LanePowell.com>; Deibebe, Darcy <DeibebeD@LanePowell.com>;

John.Alexander@CliffordChance.com

**Subject:** RE: [EXT] Frontier Airlines v. AMCK, et al. | Case No. 1:20-cv-09713

Jeff,

The difficulty we have with these edits is that it gives no reason for Frontier's service of new discovery requests on AMCK. This will likely result in the court questioning why the specific discovery had not been requested within the currently set deadline for document discovery. The court will require good cause for the extension.

If you are requesting neutrality it must contain the fact that there is a late development that could impact this litigation that caused this new set of discovery. Please advise your position within the next 30 minutes. As a compromise we propose language in the attached letter.

If this does not meet with your approval, we will file a contested motion to extend the document discovery cutoff.

We look forward to hearing from you.



**DAVID G. HOSENPUD**  
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**From:** [Jeff.Butler@CliffordChance.com](mailto:Jeff.Butler@CliffordChance.com) <[Jeff.Butler@CliffordChance.com](mailto:Jeff.Butler@CliffordChance.com)>  
**Sent:** Monday, January 10, 2022 2:13 PM  
**To:** Hosenpud, David <[HosenpudD@LanePowell.com](mailto:HosenpudD@LanePowell.com)>; Garcia, Tangi <[GarciaT@LanePowell.com](mailto:GarciaT@LanePowell.com)>  
**Cc:** Schaer, Aaron <[SchaerA@LanePowell.com](mailto:SchaerA@LanePowell.com)>; Deibebe, Darcy <[DeibebeD@LanePowell.com](mailto:DeibebeD@LanePowell.com)>;  
[John.Alexander@CliffordChance.com](mailto:John.Alexander@CliffordChance.com)  
**Subject:** FW: [EXT] Frontier Airlines v. AMCK, et al. | Case No. 1:20-cv-09713

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David,

Please see our proposed edits in "tracked changes," which are intended to make this a "neutral" request without argumentation favoring either side. With these edits, you have our consent to submit this request to the Court.

Regards,

Jeff E. Butler  
CLIFFORD CHANCE US LLP  
31 West 52nd Street  
New York, NY 10019  
Tel: +1 212-878-8205  
[jeff.butler@cliffordchance.com](mailto:jeff.butler@cliffordchance.com)

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**From:** Butler, Jeff E. (Litigation-NY)  
**Sent:** Monday, January 10, 2022 3:59 PM  
**To:** 'Hosenpud, David' <[HosenpudD@LanePowell.com](mailto:HosenpudD@LanePowell.com)>; Garcia, Tangi <[GarciaT@LanePowell.com](mailto:GarciaT@LanePowell.com)>; Alexander, John (Litigation-NY) <[John.Alexander@CliffordChance.com](mailto:John.Alexander@CliffordChance.com)>  
**Cc:** Schaer, Aaron <[SchaerA@LanePowell.com](mailto:SchaerA@LanePowell.com)>; Deibebe, Darcy <[DeibebeD@LanePowell.com](mailto:DeibebeD@LanePowell.com)>  
**Subject:** RE: [EXT] Frontier Airlines v. AMCK, et al. | Case No. 1:20-cv-09713

David,

We do not agree with the content of your letter and will send you some proposed edits. In the meantime, you do NOT have our consent to submit this to the Court.

Regards, JB

Jeff E. Butler  
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New York, NY 10019  
Tel: +1 212-878-8205  
[jeff.butler@cliffordchance.com](mailto:jeff.butler@cliffordchance.com)

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**From:** Hosenpud, David <[HosenpudD@LanePowell.com](mailto:HosenpudD@LanePowell.com)>  
**Sent:** Monday, January 10, 2022 2:59 PM  
**To:** Butler, Jeff E. (Litigation-NY) <[Jeff.Butler@CliffordChance.com](mailto:Jeff.Butler@CliffordChance.com)>; Garcia, Tangi <[GarciaT@LanePowell.com](mailto:GarciaT@LanePowell.com)>; Alexander, John (Litigation-NY) <[John.Alexander@CliffordChance.com](mailto:John.Alexander@CliffordChance.com)>  
**Cc:** Schaer, Aaron <[SchaerA@LanePowell.com](mailto:SchaerA@LanePowell.com)>; Deibebe, Darcy <[DeibebeD@LanePowell.com](mailto:DeibebeD@LanePowell.com)>  
**Subject:** RE: [EXT] Frontier Airlines v. AMCK, et al. | Case No. 1:20-cv-09713

Jeff,

Please see the attached letter motion that we plan to submit to the court today.

Let us know if there are any issues of concern.

Regards,  
David



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**From:** [Jeff.Butler@CliffordChance.com](mailto:Jeff.Butler@CliffordChance.com) <[Jeff.Butler@CliffordChance.com](mailto:Jeff.Butler@CliffordChance.com)>  
**Sent:** Monday, January 10, 2022 10:06 AM  
**To:** Hosenpud, David <[HosenpudD@LanePowell.com](mailto:HosenpudD@LanePowell.com)>; Garcia, Tangi <[GarciaT@LanePowell.com](mailto:GarciaT@LanePowell.com)>; [John.Alexander@CliffordChance.com](mailto:John.Alexander@CliffordChance.com)  
**Cc:** Schaer, Aaron <[SchaerA@LanePowell.com](mailto:SchaerA@LanePowell.com)>; Deibebe, Darcy <[DeibebeD@LanePowell.com](mailto:DeibebeD@LanePowell.com)>  
**Subject:** RE: [EXT] Frontier Airlines v. AMCK, et al. | Case No. 1:20-cv-09713

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David,

We would have no objection to an extension of the current document production deadline to February 11, 2022.

Regards, JB

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**From:** Hosenpud, David <[HosenpudD@LanePowell.com](mailto:HosenpudD@LanePowell.com)>  
**Sent:** Friday, January 7, 2022 12:36 PM  
**To:** Butler, Jeff E. (Litigation-NY) <[Jeff.Butler@CliffordChance.com](mailto:Jeff.Butler@CliffordChance.com)>; Garcia, Tangi <[GarciaT@LanePowell.com](mailto:GarciaT@LanePowell.com)>; Alexander, John (Litigation-NY) <[John.Alexander@CliffordChance.com](mailto:John.Alexander@CliffordChance.com)>; Reem, Minji (Litigation-NY) <[Minji.Reem@CliffordChance.com](mailto:Minji.Reem@CliffordChance.com)>  
**Cc:** Schaer, Aaron <[SchaerA@LanePowell.com](mailto:SchaerA@LanePowell.com)>; Deibebe, Darcy <[DeibebeD@LanePowell.com](mailto:DeibebeD@LanePowell.com)>  
**Subject:** RE: [EXT] Frontier Airlines v. AMCK, et al. | Case No. 1:20-cv-09713

Jeff,

We suggest moving the document production deadline to February 11. By our calculation, AMCK's response deadline for the second set of discovery requests is February 3. The extra week should provide Frontier with sufficient time to review and, if necessary, follow up on any questions we may have with AMCK's responses and production. That said, you know better than we do if AMCK needs more time to complete its responses and production, so please let us know if we should ask the Court for a date later than February 11.

Separately, we want to confirm that Frontier is finalizing another document production that you will receive by January 10.

Regards,



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**From:** [Jeff.Butler@CliffordChance.com](mailto:Jeff.Butler@CliffordChance.com) <[Jeff.Butler@CliffordChance.com](mailto:Jeff.Butler@CliffordChance.com)>

**Sent:** Thursday, January 6, 2022 4:28 PM

**To:** Garcia, Tangi <[GarciaT@LanePowell.com](mailto:GarciaT@LanePowell.com)>; [John.Alexander@CliffordChance.com](mailto:John.Alexander@CliffordChance.com); [Minji.Reem@CliffordChance.com](mailto:Minji.Reem@CliffordChance.com)

**Cc:** Hosenpud, David <[HosenpudD@LanePowell.com](mailto:HosenpudD@LanePowell.com)>; Schaer, Aaron <[SchaerA@LanePowell.com](mailto:SchaerA@LanePowell.com)>; Deibebe, Darcy <[DeibebeD@LanePowell.com](mailto:DeibebeD@LanePowell.com)>

**Subject:** RE: [EXT] Frontier Airlines v. AMCK, et al. | Case No. 1:20-cv-09713

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Dear David,

We received your letter dated January 4, 2022 and the accompanying second set of discovery requests. We will respond to the discovery requests in accordance with the Federal Rules.

Your letter asks whether defendants will stipulate to another extension of the discovery schedule, but there is no revised schedule proposed in your letter. Please let us know the specific date(s) you have in mind for a revised discovery schedule.

Regards,

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**From:** Garcia, Tangi <[GarciaT@LanePowell.com](mailto:GarciaT@LanePowell.com)>

**Sent:** Tuesday, January 4, 2022 8:42 PM

**To:** Butler, Jeff E. (Litigation-NY) <[Jeff.Butler@CliffordChance.com](mailto:Jeff.Butler@CliffordChance.com)>; Alexander, John (Litigation-NY) <[John.Alexander@CliffordChance.com](mailto:John.Alexander@CliffordChance.com)>; Reem, Minji (Litigation-NY) <[Minji.Reem@CliffordChance.com](mailto:Minji.Reem@CliffordChance.com)>

**Cc:** Hosenpud, David <[HosenpudD@LanePowell.com](mailto:HosenpudD@LanePowell.com)>; Schaer, Aaron <[SchaerA@LanePowell.com](mailto:SchaerA@LanePowell.com)>; Deibebe, Darcy <[DeibebeD@LanePowell.com](mailto:DeibebeD@LanePowell.com)>

**Subject:** [EXT] Frontier Airlines v. AMCK, et al. | Case No. 1:20-cv-09713

Dear Counsel,

The attached letter and Second Discovery Requests to Defendant AMCK are sent to you on behalf of David Hosenpud. Copies will be mailed.



**TANGI GARCIA**  
Legal Assistant  
(She/Her)  
[garciat@lanepowell.com](mailto:garciat@lanepowell.com)  
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